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January 7, 2004

The Honorable Richard Bennett  
United States District Court  
For the District of Maryland  
101 West Lombard Street  
Baltimore, Maryland 21201

Re: Jeffrey Lawrence v. The Imagine Yacht, L.L.C.  
Case No. MJG-02-3224-Discovery Status Report

Dear Judge Bennett:

Pursuant to this Court's Scheduling Order of April 3, 2003, as amended on June 25, 2003 and October 9, 2003, please accept this document as a joint discovery status report. Despite the best efforts of the parties, discovery has not yet been completed. Written discovery has been completed and depositions of the main fact witnesses have taken place. Nevertheless, Defendant's counsel wishes to conduct the depositions of the member's of Mr. Lawrence's law firm, Sher & Blackwell, L.L.P., who were on board the vessel at the time of the incident, due to settlement negotiations and scheduling conflicts the depositions have not been completed although they should be by the end of the month.

Again, the number of attorneys involved in this action, including the Plaintiff himself, has complicated the scheduling of depositions. The parties have also scheduled a site visit aboard the subject vessel during which sound experts for both sides will take sound readings. The Independent Medical Examination of the Plaintiff and report have been completed. The parties still need to conduct deposition of these medical experts, as well as the other experts.

Therefore, we would request a forty-five day extension to complete all discovery. The parties are amicably working together to complete all discovery by then. The parties have seriously discussed settlement, including proposed settlement figures. However, they have been unable to reach a resolution at this time. The additional depositions and site visit will assist the parties in determining their respective positions and hopefully in reaching settlement.

Very truly yours,  
RESNICK & ABRAHAM, L.L.C.

Prabir Chakrabarty  
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cc: Robert Bouse, Anderson, Coe & King, LLP  
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